

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION
BUREAU, ET AL.

Plaintiffs,

Case No.: 24-cv-00040

v.

STRATFS, LLC, ET AL.

Defendants.

**NOTICE OF RENEWED MOTION TO MODIFY THE PRELIMINARY INJUNCTION
AND MOTION CHALLENGING THE RECEIVER'S
DETERMINATION OF RECEIVERSHIP ENTITIES**

Defendants, Anchor Client Services, LLC, BCF Capital, LLC, Bedrock Client Services, LLC, Boulder Client Services, LLC, Canyon Client Services, LLC, Carolina Client Services, LLC, Great Lakes Client Services, LLC, Guidestone Client Services, LLC, Harbor Client Services, LLC, Heartland Client Services, LLC, Monarch Client Services, LLC, Newport Client Services, LLC, Northstar Client Services, LLC, Option 1 Client Services, LLC, Pioneer Client Servicing, LLC, Rockwell Client Services, LLC, Royal Client Services, LLC, Stonepoint Client Services, LLC, Strategic CS, LLC, Strategic Consulting, LLC, Strategic FS Buffalo, LLC, Strategic Family, Inc., Strategic NYC, LLC, Stratfs, LLC, Summit Client Services, LLC, T Fin, LLC, Versara Lending, LLC and Whitestone Client Services, LLC (collectively "Strategic") hereby (1) renew their motion to modify the Preliminary Injunction (Dkt. 184) to remove Atlas Debt Relief LLC and Timberline Financial LLC from the definition of "Receivership Defendants" (*see* Dkt. 184 §9(N)) and Versara Lending LLC from the list of "Corporate Defendants" (*see* Dkt. 184 §9(D)) under the Receiver's control, and (2) move to challenge the

Receiver's determination that Versara DST 2019-2, Strategic LD, LLC, and Cell Gramercy 2 of Contego Insurance, Inc. are receivership entities.

In support of this motion, Strategic submits the Attorney Declaration of Dennis C. Vacco, esq., and an accompanying memorandum of law. Strategic intends to file a reply to any opposition filed.

Dated: Buffalo, New York
October 29, 2024

Respectfully submitted,

/s/ Dennis C. Vacco
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